

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

§

Plaintiffs,

§

v.

§

STATE OF TEXAS, *et al.*,

§

Case No. 5:21-cv-00844-XR
[Lead Case]

Defendants.

§

HARRIS COUNTY REPUBLICAN PARTY, *et
al.*,

§

§

§

Intervenor-Defendants.

THE PARTIES' JOINT ADVISORY REGARDING PROPOSED SCHEDULING ORDERS

NOW COME the parties in this case and file this Joint Advisory Regarding Proposed Scheduling Orders to inform the Court of additional areas of agreement and disagreement with respect to the schedule and trial.

AREAS OF DISAGREEMENT

The disagreement between the parties involves live testimony at trial by defendant county election officials. All parties recognize and respect the need for defendant county election officials to attend to their duties of administering the November 7, 2023 General Election. All parties also recognize the need to accommodate religious observances for Rosh Hashanah and Yom Kippur, and request that the Court not hold trial on the days of September 15, 18, 25, and 26. The parties set out their specific positions below:

All Plaintiffs, State Defendants and Defendant Intervenors

In order to ensure that their live testimony at a trial starting September 27, 2023 does not interfere with defendant county election officials' duties to administer the upcoming General Election, Plaintiffs, State Defendants and Defendant Intervenors commit to the following:

1. For each defendant county election official who is subpoenaed to testify at the trial, that county election official shall appear on or before October 6, 2023. State Defendants and Defendant-Intervenors may subpoena defendant county election officials to testify during this period even if Plaintiffs have not yet completed their case in chief. Hours of testimony by defendant county election officials will be split evenly between the combination of Private Plaintiffs and the United States and the combination of State Defendants and Intervenors.
2. A subpoenaed defendant county election official shall testify on one day, unless testimony the following day is necessitated by the end of proceedings on the day that the defendant county election official is called to testify.
3. A subpoenaed defendant county election official shall be examined by all parties at the time the official is called to testify (including direct examination, cross examination and rebuttal), and the official shall not be recalled to testify during the remainder of the trial by any party.
4. Defendant county election officials shall reserve the right to request additional accommodations from the Court, including the ability to testify at trial by contemporaneous transmission from a different location.

Defendant El Paso County Elections Administrator Lisa Wise

Defendant El Paso County Elections Administrator Lisa Wise is amenable to both of the proposed schedules filed by the parties (ECF Nos. 571, 572), and does not take a position as between them.

Proposal by Defendant Counties Bexar, Dallas, Hidalgo and Travis

If the trial is scheduled to start on September 27, 2023, then, with respect to trial testimony, the parties agree that, for each county election official who is subpoenaed to testify at the trial, that county official shall appear in court, or at the county witnesses' option (with the exception of Bexar County), appear by contemporaneous transmission from a different location, on or before October 4, 2023. If the trial is scheduled to start on September 12, 2023, then, with respect to trial testimony, the parties agree that, for each county official who is subpoenaed to testify at trial, that county official shall appear in court, but shall reserve the right to request additional accommodations from the Court, including the ability to testify by contemporaneous transmission from a different location, on or before October 4, 2023. State Defendants and Defendant-Intervenors may subpoena county election officials during this period even if Plaintiffs have not yet completed their case in chief.

Defendant Harris County Elections Administrator Clifford Tatum

Defendant Harris County Elections Administrator Clifford Tatum is amenable to both of the proposed trial schedules as long as his or his employees' trial testimony (no matter which party calls him or his employees as witnesses) occurs on or before October 4, 2023. He reserves the right to request that any Harris County Elections Administrator's employee who receives a trial subpoena appear by contemporaneous transmission. Harris County Elections Administrator

Clifford Tatum opposes any schedule that would require him or his employees to testify after October 4, 2023.

AREAS OF AGREEMENT WITH RESPECT TO PRE-TRIAL MATTERS

The parties agree on the following points.

1. Consistent with their representations to the Court in the hearing of March 7, 2023, the parties agree that they will not propound additional written discovery on the county election officials unless the county election officials first agree to the written discovery. Tr. 39:9-13.
2. Consistent with their representations to the Court in the hearing of March 7, 2023, the parties agree that questioning in depositions of the county election officials will be relevant, non-redundant, and as unobtrusive as possible. Tr. 28: 22-24.
3. The parties agree that in the discovery period that remains in this case, each county election official will be deposed no more than once, regardless of the type of deposition.
4. Notwithstanding the fifteen-day deadline for filing designations of rebuttal experts and serving the materials required by Fed. R. of Civ. P. 26(a)(2)(B), the parties agree that such designations and materials are due on April 5, 2023, with regard to Dr. Kenneth R. Mayer.
5. All parties agree that depositions occurring on or after October 24, 2022, that did not count against the Court's previous "Primary Election Discovery" are limited to 70 hours combined for all Private Plaintiffs and the United States and 70 hours combined for State Defendants and Intervenors. Time will be calculated using the total record time spent by each side questioning a witness, regardless of which side noticed the deposition.
6. The parties agree to keep open the depositions of experts for the purposes of supplemental reports, whereby any additional deposition taking place after the close of discovery will be

limited solely to the content of any supplemental report, and not be used to reopen any deposition as to the content of general expert reports except to the extent that a supplemental report has altered or amended the content of such general reports.

Dated: March 29, 2023

Respectfully Submitted,

/s/ Nina Perales
Nina Perales
Julia R. Longoria
Fatima L. Menendez
Kenneth A. Parreno
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org
fmenendez@maldef.org
kparreno@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

* Admitted *pro hac vice*

Attorneys for Plaintiffs:
LA UNIÓN DEL PUEBLO ENTERO
SOUTHWEST VOTER REGISTRATION
EDUCATION PROJECT

MEXICAN AMERICAN BAR
ASSOCIATION OF TEXAS
TEXAS HISPANICS ORGANIZED FOR
POLITICAL EDUCATION
JOLT ACTION
WILLIAM C. VELASQUEZ INSTITUTE
FIEL HOUSTON INC.

/s/ Sean Morales-Doyle
Sean Morales-Doyle
Eliza Sweren-Becker*
Patrick A. Berry*
Andrew B. Garber*
Jasleen K. Singh*
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
Facsimile: (212) 463-7308
sean.morales-doyle@nyu.edu
eliza.sweren-becker@nyu.edu
patrick.berry@nyu.edu
andrew.garber@nyu.edu

* Admitted *pro hac vice*

Paul R. Genender
Texas State Bar No. 00790758
Elizabeth Y. Ryan
Texas State Bar No. 24067758
Matthew Berde*
Texas State Bar No. 24094379
Megan Cloud
Texas State Bar No. 24116207
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201

Telephone: (214) 746-8158

Facsimile: (214)746-7777

Liz.Ryan@weil.com

Paul.Genender@weil.com

Matt.Berde@weil.com

Megan.Cloud@weil.com

* Admitted *pro hac vice*

Alexander P. Cohen*

(Tex. Bar No. 24109739)

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8020

Facsimile: (212) 310-8007

Alexander.Cohen@weil.com

Attorneys for Plaintiffs:

FRIENDSHIP-WEST BAPTIST CHURCH

TEXAS IMPACT

JAMES LEWIN

/s/ Zachary Dolling

Zachary Dolling

Texas Bar No. 24105809

Hani Mirza

Texas Bar No. 24083512

Sarah Chen*

California Bar No. 325327

TEXAS CIVIL RIGHTS PROJECT

1405 Montopolis Drive

Austin, TX 78741

512-474-5073 (Telephone)

512-474-0726 (Facsimile)

zachary@texascivilrightsproject.org

hani@texascivilrightsproject.org

schen@texascivilrightsproject.org

Thomas Buser-Clancy

Texas Bar No. 24078344

Edgar Saldivar

Texas Bar No. 24038188

Savannah Kumar

Texas Bar No. 24120098

Ashley Harris

Texas Bar No. 24123238

ACLU FOUNDATION OF TEXAS, INC.

5225 Katy Freeway, Suite 350

Houston, TX 77007

Telephone: (713) 942-8146

Fax: (915) 642-6752

tbuser-clancy@aclutx.org

esaldivar@aclutx.org

skumar@aclutx.org

aharris@aclutx.org

Adriel I. Cepeda Derieux*

Ari Savitzky*

Sophia Lin Lakin*

Dayton Campbell-Harris

AMERICAN CIVIL LIBERTIES UNION FOUNDATION

125 Broad St., 18th Floor

New York, NY 10004

(212) 284-7334

acepedaderieux@aclu.org

asavitzky@aclu.org

slakin@aclu.org

dcampbell-harris@aclu.org

Susan Mizner*

AMERICAN CIVIL LIBERTIES UNION FOUNDATION

39 Drumm St.

San Francisco, CA 94111

(415) 343-0781 (phone)

smizner@aclu.org

Brian Dimmick*

AMERICAN CIVIL LIBERTIES UNION FOUNDATION

915 15th St. NW

Washington, DC 20005

(202) 731-2395 (phone)

bdimmick@aclu.org

Lucia Romano

Texas State Bar No. 24033013

Lisa A. Snead

Texas State Bar No. 24062204

Peter Hofer

Texas State Bar No. 09777275
DISABILITY RIGHTS TEXAS
2222 West Braker Lane
Austin, Texas 78758-1024
(512) 454-4816 (phone)
(512) 454-3999 (fax)
lromano@drtx.org
lsnead@drtx.org
phofer@drtx.org

Jerry Vattamala*
Susana Lorenzo-Giguere*
Patrick Stegemoeller*
ASIAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org

Jessica Ring Amunson*
Alyssa G. Bernstein*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
abernstein@jenner.com

Gregory D. Washington*
JENNER & BLOCK LLP
450 Market Street, Suite 2100
San Francisco, CA 94105
(415) 293-5937 (phone)
g washington@jenner.com
*admitted *pro hac vice*

Attorneys for Plaintiffs:
OCA-GREATER HOUSTON, ET AL.

/s/ Kenneth E. Broughton
Kenneth E. Broughton
Texas Bar No. 03087250
J. Keely Pippin*
Texas Bar No. 24116306
Reed Smith LLP
811 Main Street, Suite 1700
Houston, TX 77002-6110
Telephone: (713) 469-3800
Facsimile: (713) 469-3899
kbroughton@reedsmith.com
kpippin@reedsmith.com

Sarah M. Cummings
Texas Bar No. 24094609
Reed Smith LLP
2850 N. Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: (469) 680-4200
Facsimile: (469) 680-4299
scummings@reedsmith.com

Kathryn Sadasivan*
Amir Badat*
Victor Genecin*
Breanna Williams*
NAACP Legal Defense and
Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592
ksadasivan@naacpldf.org
abadat@naacpldf.org

Jennifer A. Holmes*
NAACP Legal Defense and
Educational Fund, Inc.
700 14th Street NW, Suite 600
Washington, DC 20005
Telephone: (202) 682-1300
Facsimile: (202) 682-1312
jholmes@naacpldf.org

Shira Wakschlag*
Megan Rusciano*
The Arc of the United States, Inc.
1825 K Street, NW, Suite 1200
Washington, DC 20006
Telephone: (202) 534-3708
Facsimile: (202) 534-3731
Wakschlag@thearc.org
mrusciano@thearc.org
* *Admitted Pro Hac Vice*

Attorneys for Plaintiffs:
HOUSTON AREA URBAN LEAGUE;
DELTA SIGMA THETA SORORITY,
INC.; THE ARC OF TEXAS; AND
JEFFREY LAMAR CLEMMONS

Uzoma N. Nkwonta*
Christopher D. Dodge*
Noah B. Baron*
Michael B. Jones*
Elena Rodriguez Armenta*
Daniela Lorenzo*
Marcos Mocine-McQueen*
Elena Rodriguez Armenta*
ELIAS LAW GROUP LLP
250 Massachusetts Ave., NW Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490
unkwonta@elias.law
cdodge@elias.law
nbaron@elias.law
mjones@elias.law
erodriguezarmenta@elias.law
dlorenzo@elias.law
mmcqueen@elias.law

James A. Rodman
Texas State Bar No. 17139525
RODMAN LAW OFFICE

5608 Parkcrest Drive, Suite 200
Austin, Texas 78731
Telephone: (512) 481-0400
Facsimile: (512) 481-0500
jimrodman@rodmanlawoffice.com
Attorneys for Plaintiffs:
LULAC TEXAS, VOTO
LATINO, TEXAS ALLIANCE FOR
RETIRED AMERICANS, TEXAS AFT
* *Admitted Pro Hac Vice*

/s/ Wendy J. Olson
Wendy J. Olson (*admitted pro hac vice*)
wendy.olson@stoel.com
Elijah M. Watkins (*admitted pro hac vice*)
elijah.watkins@stoel.com
Mark L. Bieter (*admitted pro hac vice*)
mark.bieter@stoel.com
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702
Telephone: 208.389.9000
Facsimile: 208.389.9040

Laura E. Rosenbaum (*admitted pro hac vice*)
laura.rosenbaum@stoel.com
760 SW Ninth Avenue., Suite 3000
Portland, OR 97205
Telephone: 503.224.3380
Facsimile: 503.220.2480

FREE SPEECH FOR PEOPLE
Courtney Hostetler (*admitted pro hac vice*)
chostetler@freespeechforpeople.com
Ben Clements (*admitted pro hac vice*)
bclements@freespeechforpeople.com
John Bonifaz (*admitted pro hac vice*)
jbonifaz@freespeechforpeople.com
1320 Centre St., #405
Newton, MA 02459
Telephone: 617.249.3015
LYONS & LYONS, PC

Sean M. Lyons
sean@lyonsandlyons.com
Clem Lyons
clem@lyonsandlyons.com
237 W. Travis St., Suite 100
San Antonio, TX 78205

Bradley R. Prowant (*admitted pro hac vice*)
bradley.prowant@stoel.com
33 South Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: 612.373.8800
Facsimile: 612.373.8881

Attorneys for Plaintiff:
MI FAMILIA VOTA

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division
ELISE C. BODDIE
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Daniel J. Freeman
T. CHRISTIAN HERREN, JR.
RICHARD A. DELLHEIM
DANIEL J. FREEMAN
DANA PAIKOWSKY
MICHAEL E. STEWART
JENNIFER YUN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530
(202) 305-4355
daniel.freeman@usdoj.gov

Attorneys for the UNITED STATES

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON
Chief, General Litigation Division
Tex. State Bar No. 24087727

/S/ Kathleen T. Hunker
KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

J. AARON BARNES
Special Counsel
Tex. State Bar No. 24099014

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
christopher.hilton@oag.texas.gov
kathleen.hunker@oag.texas.gov
aaron.barnes@oag.texas.gov

Attorneys for Defendants:
THE STATE OF TEXAS, GREG ABBOTT,
IN HIS OFFICIAL CAPACITY AS
GOVERNOR OF TEXAS, JANE NELSON,
IN HER OFFICIAL CAPACITY OF THE
TEXAS SECRETARY OF STATE,
WARREN K. PAXTON, IN HIS OFFICIAL
CAPACITY AS THE TEXAS ATTORNEY
GENERAL

/s/ John M. Gore

John M. Gore
E. Stewart Crosland (*pro hac vice*)
Stephen J. Kenny (*pro hac vice*)
Louis J. Capozzi (*pro hac vice*)
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 879-3939
Fax: (202) 626-1700
jmgore@jonesday.com
scrosland@jonesday.com
skenny@jonesday.com
lcapozzi@jonesday.com

Attorneys for Intervenor-Defendants:
HARRIS COUNTY REPUBLICAN
PARTY, DALLAS COUNTY
REPUBLICAN PARTY, REPUBLICAN
NATIONAL COMMITTEE, NATIONAL
REPUBLICAN SENATORIAL
COMMITTEE AND NATIONAL
REPUBLICAN CONGRESSIONAL
COMMITTEE

JOE D. GONZALES
Bexar County Criminal District Attorney

By: /s/Lisa V. Cubriel

LISA V. CUBRIEL
State Bar No. 24045731
Assistant District Attorney – Civil Division
LARRY L. ROBERSON
Civil Section Chief
Bexar County District Attorney's Office
101 W. Nueva, 7th Floor
San Antonio, Texas 78205-3030
Telephone: (210) 335-2142
Facsimile: (210) 335-2773
Email: Lisa.Cubriel@bexar.org
lroberson@bexar.org

Attorneys for Defendants:
BEXAR COUNTY ELECTIONS
ADMINISTRATOR JACQUELYN

CALLANEN AND BEXAR COUNTY
DISTRICT ATTORNEY JOE D.
GONZALES

/s/ Ben Stool

Assistant District Attorney
Texas Bar No. 19312500
Ben.stool@dallascounty.org
Barbara S. Nicholas
Assistant District Attorney
Texas Bar No. 24032785
Barbara.nicholas@dallascounty.org
Civil Division
Dallas County Records Building
500 Elm Street, Suite 6300
Dallas, TX 75202
(214) 653-7358
(214) 653-6134 (FAX)

Attorneys for Defendants:

MICHAEL SCARPELLO IN HIS
OFFICIAL CAPACITY AS THE DALLAS
COUNTY ELECTIONS
ADMINISTRATOR AND JOHN
CREUZOT IN HIS OFFICIAL CAPACITY
AS DALLAS COUNTY DISTRICT
ATTORNEY

/s/ Orion Armon

Orion Armon (CO SBN 34923)
COOLEY LLP
1144 15th Street, Suite 2300
Denver, CO 80202-2686
Telephone: +1 720 566-4000
Facsimile: +1 720 566-4099
oarmon@cooley.com

COOLEY LLP
Kathleen Hartnett* (CA SBN 314267)
khartnett@cooley.com
Beatriz Mejia* (CA SBN 190948)
bmejia@cooley.com
David Louk* (CA SBN 304654)
dlouk@cooley.com

Kelsey Spector* (CA SBN 321488)
kspector@cooley.com
Germaine Habell* (CA SBN 333090)
ghabell@cooley.com
Caroline A. Lebel* (CA SBN 340067)
clebel@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: +1 415 693-2000
Facsimile: +1 415 693-2222
STATES UNITED DEMOCRACY CENTER
Christine P. Sun* (CA SBN 218701)
3749 Buchanan St., No. 475165
San Francisco, CA 94147-3103
Telephone: +1 615 574-9108
christine@statesuniteddemocracy.org

STATES UNITED DEMOCRACY
CENTER
Ranjana Natarajan (TX SBN 24071013)
1801 E 51st St., Suite 365, No. 334
Austin, TX 78723
Telephone: +1 323 422-8578
ranjana@statesuniteddemocracy.org

STATES UNITED DEMOCRACY
CENTER
Marina Eisner* (DC SBN 1005593)
1101 17 Street NW
Washington, DC 20036
Telephone: +1 240 600-1316
marina@statesuniteddemocracy.org

STATES UNITED DEMOCRACY
CENTER
Robert Cotter* (IL SBN 6334375)
7510 N. Greenview Ave., Apt. #3
Chicago, IL 60626
Telephone: +1 224-235-2606
robert@statesuniteddemocracy.org
*Admitted *pro hac vice*

Attorneys For Defendant:
LISA WISE, IN HER OFFICIAL
CAPACITY AS THE EL PASO COUNTY
ELECTIONS ADMINISTRATOR

/s/ Sameer S. Birring
CHRISTIAN D. MENEFEE
Harris County Attorney
Texas Bar No. 24088049
Christian.Menefee@harriscountytx.gov
JONATHAN G.C. FOMBONNE
First Assistant Harris County Attorney
Texas Bar No. 24102702
Jonathan.Fombonne@harriscountytx.gov
TIFFANY S. BINGHAM
Managing Counsel, Affirmative Litigation
Division
Texas Bar No. 24012287
Tiffany.Bingham@harriscountytx.gov
SAMEER S. BIRRING
Senior Assistant County Attorney
Texas Bar No. 24087169
Sameer.Birring@harriscountytx.gov
OFFICE OF THE HARRIS COUNTY
ATTORNEY
1019 Congress Plaza, 15th Floor
Houston, Texas 77002
Telephone: (713) 274-5101
Facsimile: (713) 755-8924

Attorneys for Defendant:
CLIFFORD TATUM, IN HIS OFFICIAL
CAPACITY AS HARRIS COUNTY
ELECTIONS ADMINISTRATOR

OFFICE OF CRIMINAL DISTRICT
ATTORNEY,
TORIBIO “TERRY” PALACIOS
HIDALGO COUNTY, TEXAS

/s/ Josephine Ramirez-Solis
Josephine Ramirez-Solis
Assistant District Attorney
Texas Bar No. 24007894
josephine.ramirez@da.co.hidalgo.tx.us
Leigh Ann Tognetti
Assistant District Attorney
Texas Bar No. 24083975
leigh.tognetti@da.co.hidalgo.tx.us
100 E. Cano, First Floor

Hidalgo County Courthouse Annex III
Edinburg, Texas 78539
Tel: (956) 292-7609
Fax: (956) 318-2301

Attorneys For Defendant:
HIDALGO COUNTY
ELECTIONS ADMINISTRATOR
DELIA GARZA
County Attorney, Travis County
P. O. Box 1748
Austin, Texas 78767
Telephone: (512) 854-9513
Facsimile: (512) 854-4808

By: /s/ Anthony J. Nelson
LESLIE W. DIPPEL
State Bar No. 00796472
Leslie.Dippel@traviscountytx.gov
ANTHONY J. NELSON
State Bar No. 14885800
Tony.Nelson@traviscountytx.gov
PATRICK T. POPE
State Bar No. 24079151
Patrick.Pope@traviscountytx.gov

Attorneys For Defendants:
DYANA LIMON-MERCADO AND JOSÉ
GARZA, IN THEIR OFFICIAL
CAPACITIES AS TRAVIS COUNTY
CLERK, AND DISTRICT ATTORNEY,
RESPECTIVELY

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 28th day of March 2023.

/s/ Nina Perales
Nina Perales